

UNITED STATES DISTRICT COURT

for the

Eastern District of Virginia

Lee Pele

Plaintiff

v.

Trans Union, LLC

Defendant

Civil Action No. 1:13-cv-757

(If the action is pending in another district, state where:)

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To: Pennsylvania Higher Education Assistance Agency d/b/a American Education Services, Serve: CT Corporation System, Registered Agent, 4701 Cox Road, Suite 301, Glen Allen, Virginia 23060

☒ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and permit their inspection, copying, testing, or sampling of the material: See attached Exhibit "A".

Place: Blankingship & Christiano, P.C., 11790 Sunrise Valley Drive, Suite 103, Reston, Virginia 20191

Date and Time:

08/29/2013 10:00 am

☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The provisions of Fed. R. Civ. P. 45(c), relating to your protection as a person subject to a subpoena, and Rule 45 (d) and (e), relating to your duty to respond to this subpoena and the potential consequences of not doing so, are attached.

Date: August 13, 2013

CLERK OF COURT

OR



Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail, and telephone number of the attorney representing (name of party)

Lee Pele

, who issues or requests this subpoena, are:

Thomas B. Christiano, Blankingship & Christiano, P.C., 11790 Sunrise Valley Drive, Suite 103, Reston, Virginia 20191, (571) 313-0412, tom@blankingship.com

AO 88B (Rev. 06/09) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action (Page 2)

Civil Action No. 1:13-cv-767

PROOF OF SERVICE*(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)*

This subpoena for *(name of individual and title, if any)* Pennsylvania Higher Education Assistance Agency
was received by me on *(date)* 08/14/2013 .

☒ I served the subpoena by delivering a copy to the named person as follows: Katie Bush, Agent for
CT Corporation System, Registered Agent, 4701 Cox Rd, Ste. 301, Glen Allen, VA 23060
at 12:50 pm on *(date)* 08/16/2013 ; or

☐ I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____ .

My fees are \$ _____ for travel and \$ 70.00 for services, for a total of \$ 70.00 .

I declare under penalty of perjury that this information is true.

Date:

8/20/13*Server's signature*Eddie W. Null, Sr./Private Process Server*Printed name and title*

Tiger Legal Services, LLC
10522 Crestfield Lane
Spotsylvania, VA 22553
(540) 785-2317

Server's address

Additional information regarding attempted service, etc:

A letter is attached, authorizing Katie Bush to accept service for CT Corporation System.

Service Authorization

CT Corporation System is registered agent for various corporations, limited liability companies and partnerships. The following persons are designated in the office of the corporation upon whom any process, notice or demand may be served as representatives of the Corporation.

Tinika C. Baylor

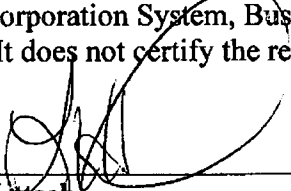
Katie E. Bush

Teresa Brown

Dacia Jamison

Lisa Uttech

This authorization pertains to the authority of individuals to receive process on behalf of CT Corporation System, Business Filings Incorporated, and National Registered Agents, Inc. It does not certify the receipt or acceptance of any specific process.



Lisa Uttech
Corporate Operations Manager
CT Corporation System
A Wolters Kluwer Company

State of Virginia
County of Henrico

This day personally appeared before me, Lisa Uttech, whose name is signed above and who, being first duly sworn, upon her oath, states that the foregoing Affidavit is true to the best of her knowledge and belief.

Subscribed and sworn before me this 17 day of April, 2012



Notary Public

#286304

8/31/12

Exhibit A

PHEAA has reported derogatory credit information to credit reporting agencies related to disputed PHEAA accounts. These accounts are appearing on Lee Pele's credit file. Lee Pele disputes these accounts because they are not his and were opened by his father, Moshe Pele, for Lee Pele's siblings. Lee Pele's current address is [REDACTED] his Social Security number is [REDACTED] and his birthday is [REDACTED]. If you need any other identifying information related to Lee Pele please contact Plaintiff's counsel at tom@blankingship.com for the additional information.

This subpoena seeks to discover account information related to these PHEAA accounts that appeared in Plaintiff's credit data. Plaintiff requests that PHEAA produce the following documents:

1. Any and all documents in your possession, custody, or control relating to or concerning Lee Pele (see identifying information above), including, but not limited to, all applications completed by Pele, any corresponding documentation or paperwork accompanying the application(s), credit reports reviewed, loan officer working file, installment account agreement, contracts executed, granting or denials of credit, as well as any increases or decreases in interest rates, payment history, past due notices, past due fees charged, all correspondence to and from Lee Pele, and any other documents in your files regarding any of Lee Pele's account(s) from on or about August 2006.
2. A printout of your complete computer file on Lee Pele, including all screen prints, computer printouts, computer logs, account call logs, account summaries, account history, denial correspondence, collection activity, charge off information, profit and loss write-off information, or any other computer information files (along with any coding definitions necessary to read any computer printouts) regarding any of Lee Pele's account(s) from on or about August 2006 to date.